

No.	Section	EPA Comment	EA Response
1	1.1	Include a site location figure that shows the site and the five areas.	Added Figures and referenced in text.
2	1.6	Why is this section gutted? Revise the first sentence. Source Material is being addressed to target health based concentrations.	The prior text was moved to section 3.1.2 in addressing the first round of EPA comments (3a). Revised the first sentence for clarity and revised Section 1.6 to clarify that source material is being addressed to target health concentrations.
3	2.2	lead source area is ‘characteristic’ hazardous waste. Please clarify.	Text has been changed to "characteristic hazardous waste"
4	2.3.2	Was there TCLP pre-testing during the pilot study? In any case, the result was the same as the bench-scale sample?	TCLP pre-testing occurred during the pilot study. The document was re-worded and clarified. In both the pilot study and benchmark, the Freeflow amendment reduced Lead TCLP to below the hazardous waste criteria.
5	2.5	Perhaps including the tables from the ROD would be best. This list implies that all of the subpart sections ARARs when they are not.	List removed and tables were included
6	3.1.2 and 3.1.3	Post excavation sampling is not sufficiently described. Identify and describe the sampling strategy for the excavated areas: what size is the sample grid at the base, what is the size of the sample gird along the walls, where will the grab sample be taken within each grid, grid size around excavation at surface, etc. For consistency, use a similar process to that used during the residential sampling: 100x100ft grids with 5 pt composites.	Added in post excavation sampling to sections 3.1.2 and 3.1.3
7.a	3.1.3	Revise the description. -> Revise the following sentence “ A final grading survey would will be conducted after backfilling of the excavation and any necessary backfilling is completed.’	Text revised for clarity
7.b	3.1.3	Revise the description. -> As stated in previous comments, the use of backfill is not preferred in this area and attempts to grade the areas for proper drainage without the import of backfill should be the first step in area completion. ‘The excavated areas will be graded to drain, minimizing low spots and steep slopes and using runoff controls where necessary. Because the final site remedy has not been selected, the import of backfill to the lead source area will be used only as a last effort to control drainage. This limitation is to restrict the placement of clean backfill in an area that may be addressed in the final remedy. Adding clean backfill may result in an increase in the volume of material that will need to be remediated. Any additional backfill in this area will require consultation with EPA and ODEQ., then organic topsoil will be applied. The area will then be re-vegetated with native plants and grasses via hydroseeding. The RA Contractor will be responsible for watering until 80% vegetative coverage is achieved.	Revised the description as provided
8	3.2.3	There is no long-term monitoring or inspections. Remove this discussion.	Discussion removed in text regarding erosion monitoring or inspections.
Figures			
9	D-3	Tank 11: Soil Boring locations and results? Any tank waste noted?	No soil boring locations we identified for the unpublished RI Data of 2016. Tank waste was noted and identified using historical aerial photography with depth extent supported by ROST data from Lockheed Martin SERAS 2016.
10	D-5	Pit 1: LIF locations? Also, include excavation of the lead grid that exceeded 800 mg/kg (12in removal due to sample results of 906mg/kg 6in and 5850mg/kg at 12in depth. See attached figure.	Included LIF locations and excavation of the lead grid with exceedances to Figure D-5. Revised cost estimate.
11	D-7	purpose of the erosion box?	Removed erosion box from Figure.
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Drawings			
12	C112	The loading area and access road are directly over the waste excavation area. Does the location of the access road need to be revisited?	Moved access away from excavation area in C-112
Specifications			
13	01 10 00-2 Section 1.7A	Source Material is being addressed to target health based concentrations.	Changed wording in 01 10 00-2 Section 1.7A to clarify source material language.
14	02 61 00, Section 1.6B	Include a statement that indicates temporary materials, including access road material, if uncontaminated may be stockpiled onsite for use during site-wide RA or reference the appropriate section that discusses this.	Added statement into Section 1.6B that includes the comment.
15	02 60 00-9, Section 3.16	Refer to comment above for sampling strategy.	Clarified statement in reference to comment above for sampling strategy
16	31 10 00-1; section 3.1A	Incomplete section.	Updated Section 3.1A to removed incomplete section.
17	31 23 23	Include a discussion of the backfill and top soil sampling needed to show it to be uncontaminated. Also, include the frequency of sampling, that is the number per cubic yard of material brought to the site.	Included discussion of backfill and top soil sampling to show uncontaminated in 21 23 23.
18	31 34 19 and 33 42 13	These sections should include a discussion on removal of materials or reference the appropriate sections that discuss removal.	Added Removal in Specifications 31 34 19 and 33 42 12
ODEQ Comments (Todd Downham)			
1	N/A	I have found that a 40’ x 40’ (1600 Sq. ft.) grid works well for floor sampling, and every 40’ linear feet for wall sample. This frequency was utilized during the EPA Removal action at the residence in the East Tank Farm. If the sidewall material is not homogenous based on field screening methods (visual, PID, etc.) an aliquot representing each variation can be collected vertically along the side wall to represent the wall sample. If a wall sample exceeds, additional excavation 20’ on either side of the exceedance should occur. Please see the attached document for more information regarding confirmation sampling approach and additional excavation depths if confirmation sample exceedances do occur.	As noted in Comment #6 post-excavation sampling was incorporated into the final design.
2	N/A	2.Please see the attached DEQ borrow soils sampling recommendation.	As noted in Comment #17 this discussion of backfill and top soil sampling to show uncontaminated was incorporated in 21 23 23.